

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>NEW HOPE HOSPITALITY, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	<b>CASE NO. 3:15-CV-02296-B</b>
<b>v.</b>	§	
	§	
<b>EH NATIONAL BANK,</b>	§	
	§	
<b>Defendant,</b>	§	

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**PLAINTIFF'S PRETRIAL DISCLOSURES  
PURSUANT TO RULE 26(a)(3)**

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To: EH National Bank by and through its counsel of record Mark Stromberg, Stromberg Stock, 8750 N. Central Expressway, Ste. 625, Dallas, Texas 75231.

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff discloses and states:

- (i) **the name and, if known, the address and telephone number of each individual of each witness:**

**A. Plaintiffs Expect to Call the Following Witnesses**

**Tarlochan Kataria**  
**Manager of New Hope Hospitality, LLC**  
c/o Joyce W. Lindauer  
Joyce W. Lindauer Attorney, PLLC  
12720 Hillcrest Road, Suite 625  
Dallas, Texas 75230  
(972) 503-4033 (telephone)  
(972) 503-4034 (facsimile)

**B. Plaintiffs May Call the Following Witnesses**

Joyce W. Lindauer  
Joyce W. Lindauer Attorney, PLLC  
12720 Hillcrest Road, Suite 625  
Dallas, Texas 75230  
(972) 503-4033 (telephone)  
(972) 503-4034 (facsimile)

**(ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:**

None.

**(iii) an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises**

1. Voluntary Petition of New Hope Hospitality, LLC, for Chapter 11 Bankruptcy, dated March 30, 2012.
2. Election of Secured Creditor Pursuant to 11 U.S.C. §1111(b), dated January 4, 2013.
3. First Amended Plan of Reorganization of New Hope Hospitality, LLC, dated January 11, 2013
4. First Amended Disclosure Statement of New Hope Hospitality, LLC, dated January 11, 2013.
5. First Modificaton to First Amended Plan of Reorganization of New Hope Hospitality, LLC, dated February 5, 2013.
6. Second Modification to First Amended Plan of Reorganization of New Hope Hospitality, LLC, dated March 13, 2013.
7. Order Confirming Debtor's First Amended Plan of Reorganization, entered March 29, 2013.
8. Closing Statement, dated January 27, 2015.

Respectfully Submitted By:

/s/ Joyce W. Lindauer

Joyce W. Lindauer

State Bar No. 21555700

Joyce W. Lindauer Attorney, PLLC

12720 Hillcrest Road, Suite 625

Dallas, TX 75230

Telephone: (972) 503-4033

Facsimile: (972) 503-4034

Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on July 15, 2016, I served a true and correct copy of the foregoing document upon the parties listed below via facsimile and email:

Mark Stromberg, Stromberg Stock  
8750 N. Central Expressway, Ste. 625  
Dallas, Texas 75231  
Fax: 972-861-5339  
mark@strombergstock.com

/s/ Joyce Lindauer

Joyce Lindauer